

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

MARC MARTEL

Plaintiff,

v.

**COMPUTER
CORPORATION**

SCIENCES

Defendant.

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Civil Action No. 1:17-cv-00407-SM

**DEFENDANT COMPUTER SCIENCES CORPORATION'S
PROFFER PURSUANT TO APRIL 5, 2019 ORDER**

NOW INTO COURT, through undersigned counsel, comes Computer Sciences Corporation (“CSC” or “Defendant”) and submits the following proffer in further support of its opposition to Plaintiff’s pending Motion to Compel and in response to the Court’s directives of April 4, 2019 and Endorsed Order of April 5, 2019.

Information Defendant communicated to Plaintiff concerning investigation of internal complaints includes the following:

1. On July 1, 2014, Martel submitted to the CSC Ethics & Compliance Office (“ECO”) what he called “ethical concerns” related to his fiscal year 2014 performance evaluation and complained that he disagreed with the rating and felt his supervisor had not followed proper procedures in completing the appraisal.

2. Martel was notified the matter was being referred from ECO to business unit Human Resources (“HR”) for review.

3. On August 4, 2014, Martel inquired with ECO as to status, stating that he had not heard from the assigned HR business partner.

4. On August 5, 2014, Martel was informed that the matter had been reassigned to an Employee Relations (“ER”) professional; ER promptly contacted Martel and set up a call for August 11, 2014 to discuss his concerns.

5. On August 8, 2014, Martel was notified by his supervisor that his position had been eliminated in a reorganization of the area of the business in which he worked and that he was being laid off in a reduction in force.

6. The decisions that impacted Martel’s area of the business and his employment were made before and/or without knowledge of Martel’s July 1, 2014 submission of “ethical concerns.”

7. Martel then contacted ECO and ER, stating that he had been terminated with an open ethics complaint. Martel was informed by ECO that he would continue to work with ER regarding his concerns.

8. However, also on August 8, 2014, Martel contacted the heads of ECO and Legal indicating that he had been terminated and had an open ethics complaint. Martel requested their assistance and asked if it was possible to remain with CSC until issues he raised were investigated and resolved.

9. Martel was informed that his layoff in the RIF was temporarily suspended pending investigation, CSC would expedite investigation, and in the meantime, he was relieved of job responsibilities but would continue on CSC payroll.

10. Martel was interviewed by ER on August 11, 2014, as previously planned.

11. Martel submitted a written complaint on August 11, 2014 asserting additional allegations, including of purported illegality.

12. On August 12, 2014, Martel was informed that an ECO investigator had been assigned to investigate.

13. Martel was interviewed by ECO, and Martel provided information to ECO related to his concerns.

14. On or about Sept. 2, 2014, ECO spoke with Martel and indicated that the investigation had concluded and he would soon hear from management regarding his status.

15. On Sept. 8, 2014, Martel was notified by his supervisor that his layoff in the RIF would proceed, effective on that date.

Respectfully submitted this the 12th day of April, 2019.

/s/Bryan Edward Bowdler

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**COUNSEL FOR DEFENDANT,
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CERTIFICATE OF SERVICE

I certify that on April 12, 2019 I filed the foregoing using the Court's CM/ECF notice that will send electronic notice of filing to the following:

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